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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA SHAW,)	Case No.	2:24-cv-00132-RFB-DJA
)		
Plaintiff,)		
vs.)	STIPULATION AND ORDER TO EXTEND	
)	DISCOVERY DEADLINES	
THE VONS COMPANIES, INC., a foreign)		
corporation, dba VONS, SAFEWAY, INC., a)		
Foreign Corporation; DOES I through X; and)	<i>First Request</i>	
ROE CORPORATIONS I through X, inclusive,)		
Defendants.)		

In accordance with Local Rules of Practice for the United States District Court for the District of Nevada (²⁶⁻³“LR”) ~~26-4~~, Defendants THE VONS COMPANIES, INC. and SAFEWAY, INC. (“Defendants”), by and through their counsel of record, the law firm of BACKUS | BURDEN, and Plaintiff Maria Shaw (“Plaintiff”), by and through her counsel of record, the law firm H&P LAW, hereby stipulate and agree to an extension of all remaining discovery deadlines by sixty (60) days. The parties propose the following revised discovery plan:

Pursuant to Local Rule 6-1(b), the Parties hereby aver that this is the first such discovery extension requested in this matter. Moreover, 1) there is no danger of prejudice as the extension is stipulated by the Parties; 2) a sixty (60) day extension will not impact a trial date because the same has not been scheduled; 3) the Parties, their respective Counsel, and witnesses have been limited

in appearing for deposition due to the Covid-19 pandemic; and 4) the requested extension is made in good faith by both Parties. *Pioneer Investment Services v. Brunswick Associate's, Ltd.*, 507 U.S. 380, 395 (1993).

I.

DISCOVERY COMPLETED TO DATE

1. Plaintiff served her Initial Disclosure Pursuant to FRCP 26 on February 15, 2024;
2. Defendant served its Initial Disclosure Pursuant to FRCP 26 on February 22, 2024;
3. Plaintiff produced her First Sets of Requests for Production and Interrogatories to Defendant, which were answered;
4. Defendant produced its First Sets of Requests for Production and Interrogatories to Plaintiff, which were answered;
5. Plaintiff served her First Supplemental Disclosure Pursuant to FRCP 26 on February 8, 2024;
6. Defendant took Plaintiff's deposition on April 11, 2024;
7. Defendant intends to notice the following Custodians of Records Depositions:
 - a. American Medical Response
 - b. ATI Physical Therapy
 - c. Desert Radiology
 - d. Shadow Emergency Physicians
 - e. Southwest Medical Associates
 - f. Spring Valley Hospital

II.

DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY

Discovery to be completed includes:

1. Supplementation of the Parties FRCP 26 Initial Disclosures.

3. Depositions of fact witnesses.
4. Depositions of Plaintiff's treating medical providers.
5. Depositions of Defendant's employees.
6. Deposition of Defendant's FRCP 30(b)(6) representative(s).
7. FRCP 26(a)(2) designation of initial and rebuttal expert witnesses.
8. Depositions of initial and rebuttal expert witnesses.

Additional written discovery and depositions as the Parties deem necessary.

The Parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN TIME SET BY DISCOVERY PLAN

On March 20, 2024, Defendants filed their Motion for Protective Order Pursuant to FRCP 26(c). [Doc. 13.] While the Motion is pending, the Parties are unable to proceed with Plaintiff's previously noticed FRCP 30(b)(6) deposition(s). As such, the parties agree to extend discovery deadlines for sixty (60) days. The parties have entered into this agreement in good faith and not for purposes of delay.

IV. DISCOVERY DEADLINES

Discovery cutoff:	August 29, 2024
Amending the pleadings or adding parties:	July 1, 2024
Initial expert disclosures:	July 1, 2024
Rebuttal expert disclosures:	July 30, 2024
Dispositive motions:	September 30, 2024
Joint Pre-Trial Order, if no Dispositive Motions:	October 30, 2024

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VII.
[PROPOSED] NEW DISCOVERY DEADLINES

Discovery cutoff:	<i>October 28, 2024</i>
Amending the pleadings or adding parties:	<i>August 30, 2024</i>
Expert disclosures:	<i>August 30, 2024</i>
Rebuttal expert disclosures	<i>September 30, 2024</i>
Dispositive motions:	<i>November 29, 2024</i>
Joint Pre-Trial Order, if no Dispositive Motions:	<i>December 30, 2024</i>

The Parties aver that this request for extension of discovery deadlines is made by the Parties in good faith and not for the purpose of delay.

DATED this 22nd day of April, 2024.
H&P LAW

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DATED this 22nd day of April, 2024.
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ORDER

IT IS SO ORDERED.


 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

DATED: April 23, 2024